



THE CITY OF SAN DIEGO

April 15, 2005

Mr. Sunil Harman, Director
Airport System Planning
San Diego County Regional Airport Authority
Post Office Box 82776
San Diego, CA 92138-2776

Dear Mr. Harman:

Subject: City of San Diego Review and Comment to the Draft San Diego County Airport Land Use Compatibility Plan

The City of San Diego appreciates the opportunity to review the draft Airport Land Use Compatibility Plan (ALUCP). Since November 2004, and as directed by the Airport Authority Board, Airport Authority staff met with City staff several times to establish common ground and coordinate developing land use compatibility policies that would be sensitive to implementing the City's housing, employment, economic, and community needs. The City of San Diego staff was hopeful that meaningful dialogue between staff could have resulted in policies that would have been mutually developed to achieve Airport Authority's goals, while maintaining the integrity of the City of San Diego's land use plans. However, the process of engaging in an effective dialogue regarding the development of such policies was adversely influenced by the tight timeframe proposed for adoption of the ALUCP (June 30, 2005). This was exacerbated by the trickling of information to City staff to assess the impacts of proposed policies and provide comprehensive recommendations.

In general, the draft ALUCP reflects the narrow purposes of protecting airport expansion and operations while addressing aircraft noise and safety concerns, with little consideration of impacts to the City on housing, employment, and community serving facilities. The City has estimated that approximately 17,000 future housing units alone would be impacted by the proposed ALUCP for the San Diego International Airport (SDIA). The proposed policies would significantly alter plan land use and zoning designations and undermine the City's Progress Guide and General Plan and individual community plan goals and policies. Furthermore, the draft land use compatibility policies hold the City to land use restrictions that exceed state and federal requirements providing for public health, safety and welfare within airports' environs. The City's concerns regarding impacts of proposed land use compatibility policies were repeatedly echoed at the joint staff meetings that took place prior to the release of the draft ALUCP. As such, the attached comments should not be new information to you or your staff.



Planning Department

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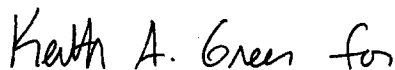
Given the potential impacts associated with the draft ALUCP, City staff believes that a single Environment Impact Report for all of the airports included in the ALUCP should be prepared to address all of the potential cumulative impacts regionwide associated with the ALUCP, rather than separate environmental documents for each airport. The intent of the California Environmental Quality Act (CEQA) is to inform the public and decision makers of the potential impacts associated with a regionwide plan, and of the reasonable alternatives to reduce these impacts. The multiple environmental documents prepared for the various chapters of the ALUCP appear to be "piecemealing" the project under CEQA.

It is also a concern of the City of San Diego that more outreach to the affected community planning groups and other stakeholders has not occurred. It appears that the time frame to get the ALUCP adopted in June has resulted in the inability to have effective discussions between staff, and has curbed a wider public outreach and involvement effort. It is recommended that the Airport Authority Board delay action on the adoption of the proposed ALUCP for six to twelve months, and use this time to refine the proposed policies with the local jurisdictions, community planning groups, and affected stakeholders.

The City's comments to the draft ALUCP are shown in attachments A, B, and C. Attachment A is a summary of major impacts and suggested modifications to the draft Airport Land Use Compatibility policies to minimize such impacts; attachment B provides comments to specific policies with proposed revisions to the draft ALUCP in a strikeout/underline format; attachment C is proposed revisions (maps) to the draft ALUCP compatibility zone boundaries for SDIA, Marine Corps Air Station (MCAS) Miramar, Montgomery Field Municipal Airport, and Brown Field Municipal Airport.

Should you have any questions regarding these comments, please contact Keith Greer, Deputy Planning Director at (619) 236-7258 or e-mail: kgreer@san-diego.gov.

Sincerely,

Handwritten signature of Keith A. Greer in black ink.

S. Gail Goldberg, AICP
Planning Director

SGG/KAG/TG/ah

- Enclosures:
- A. Summary of Major Impacts and Suggested Modifications to Land Use Compatibility Policies in the Draft San Diego County ALUCP
 - B. Comments to Specific Policies with Revisions to the Draft San Diego County ALUCP Document (Strikeout/Underline Format)
 - C. Proposed Revisions to the Draft ALUCP Compatibility Zone Boundaries for SDIA, MCAS Miramar, Montgomery Field Municipal Airport, and Brown Field Municipal Airport (Maps)

cc: City of San Diego:
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